

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OKLAHOMA**

STATE OF OKLAHOMA, ex rel., W. A. DREW)
EDMONDSON, in his capacity as ATTORNEY)
GENERAL OF THE STATE OF OKLAHOMA and)
OKLAHOMA SECRETARY OF THE)
ENVIRONMENT C. MILES TOLBERT, in his)
capacity as the TRUSTEE FOR NATURAL)
RESOURCES FOR THE STATE OF)
OKLAHOMA,)

Plaintiff,)

v.)

Case No. 4:05-CV-329-JOE-SAJ

TYSON FOODS, INC.; TYSON POULTRY, INC.;)
TYSON CHICKEN, INC.; COBB-VANTRESS,)
INC.; AVIAGEN, INC.; CAL-MAINE FOODS,)
INC.; CARGILL TURKEY PRODUCTION, LLC;)
GEORGE'S, INC.; GEORGE'S FARMS, INC.;)
PETESON FARMS, INC.; SIMMONS FOODS,)
INC; and WILLOW BROOK FOODS, INC.,)

Defendants.)

MOTION FOR ADMISSION *PRO HAC VICE*

R. Thomas Lay ("Movant"), local counsel of record for Defendant Willow Brook Foods, Inc., moves the Court, pursuant to Local Civil Rules 83.2(g) and 83.3(a), (b), to admit Thomas J. Grever and Jennifer S. Griffin to the Bar of this Court *Pro Hac Vice*, in support of which I represent and certify that the following statements are complete, true and correct:

1. The undersigned R. Thomas Lay (Raymond Thomas Lay) is a member of the Bar of this Court and is counsel of record for Defendant Willow Brook Foods, Inc.

2. Pursuant to LCvR 83.2(g), attached to this Motion as exhibits are completed Requests for Admission *Pro Hac Vice* of Thomas J. Grever and Jennifer Stockton Griffin.

3. Thomas J. Grever is a member in good standing of the bars of Ohio and Missouri, and is admitted to practice in the state and federal courts reflected in Exhibit "1" attached hereto.

4. Jennifer Stockton Griffin is a member in good standing of the bars of Missouri and Kansas, and is admitted to practice in the state and federal courts reflected in Exhibit "2" attached hereto.

5. The undersigned R. Thomas Lay respectfully requests the admission of Thomas J. Grever and Jennifer Stockton Griffin to practice before this Court solely for the purpose of appearing as counsel on behalf of the Defendant, Willow Brook Foods, Inc.

WHEREFORE, the undersigned respectfully requested that Thomas J. Grever and Jennifer Stockton Griffin be admitted to the bar of this Court for the purpose of representing Defendant Willow Brook Foods, Inc. in this matter.

Dated this 3rd day of October, 2005.

Respectfully submitted,



R. THOMAS LAY, OBA #5297
Kerr, Irvine, Rhodes & Ables
201 Robert S. Kerr Ave., Suite 600
Oklahoma City, OK 73102
(405) 272-9221 (405) 236-3121 (fax)
rtl@kiralaw.com

ATTORNEYS FOR DEFENDANT,
WILLOW BROOK FOODS, INC.

CERTIFICATE OF SERVICE

I hereby certify that on this 3rd day of October, 2005, I electronically transmitted the foregoing document to the Clerk of the Court using the ECF System for filing and transmittal of a Notice of Electronic Filing to the following ECF registrants:

C. Miles Tolbert, Esq. Secretary of the Environment 3800 N. Classen Blvd. Oklahoma City, OK 73118 mtolbert@owrb.state.ok.us	David Phillip Page, Esq. James Randall Miller, Esq. Louis Werner Bullock, Esq. Miller Keffer & Bullock 222 S. Kenosha Tulsa, OK 74120-2421 davidpage@mklawtulsa.net rmiller@mkblaw.net lbullock@mkblaw.net
Douglas Allen Wilson, Esq. Melvin David Riggs, Esq. Richard T. Garren, Esq. Sharon K. Weaver, Esq. Riggs, Abney, Neal, Turpen, Orbison & Lewis 502 W. 6 th St. Tulsa, OK 74119-1010 Doug_Wilson@riggsabney.com driggs@riggsabney.com rgarren@riggsabney.com sweaver@riggsabney.com	Elizabeth C. Ward, Esq. Frederick C. Baker, Esq. Motley Rice LLC 28 Bridgeside Blvd. Mount Pleasant, SC 29464 lward@motleyrice.com fbaker@motleyrice.com
Robert Allen Nance, Esq. Dorothy Sharon Gentry, Esq. Riggs, Abney, Neal, Turpen, Orbison & Lewis 5801 N. Broadway, Suite 101 Oklahoma City, OK 73118 rnance@riggsabney.com sgentry@riggsabney.com	W. A. "Drew" Edmondson, Esq. Office of Attorney General State of Oklahoma State Capitol Building, Room 112 2300 N. Lincoln Blvd. Oklahoma City, OK 73105 drew_edmondson@oag.state.ok.us

<p>William H. Narwold, Esq. Motley Rice LLC 20 Church St., 17th Floor Hartford, CT 06103 bnarwold@motleyrice.com</p>	<p>Stephen L. Jantzen, Esq. Patrick M. Ryan, Esq. Ryan, Whaley & Coldiron, P.C. 900 Robinson Renaissance 119 N. Robinson Ave. Oklahoma City, OK 73102 sjantzen@ryanwhaley.com pryan@ryanwhaley.com</p>
<p>Martin Allen Brown, Esq. Philip D. Hixon, Esq. Nicole Marie Longwell, Esq. Archer Scott McDaniel, Esq. Chris A. Paul, Esq. Joyce Paul & McDaniel 1717 S. Boulder Ave., Suite 200 Tulsa, OK 74119 mbrown@jpm-law.com phixon@jpm-law.com nlongwell@jpm-law.com smcdaniel@jpm-law.com cpaul@jpm-law.com</p>	<p>Theresa Noble Hill, Esq. John H. Tucker, Esq. Rhodes Hieronymus Jones Tucker & Gable 100 W. 5th St., Suite 400 P. O. Box 21100 Tulsa, OK 74121-1100 Thill@rhodesokla.com jtuckercourts@rhodesokla.com</p>
<p>Jay Thomas Jorgensen, Esq. Thomas C. Green, Esq. Mark D. Hopson, Esq. Timothy K. Webster, Esq. Sidley Austin Brown & Wood LLP 1501 K Street, N.W. Washington, D.C. 20005 jjorgensen@sidley.com tcgreen@sidley.com mhopson@sidley.com twebster@sidley.com</p>	



R. THOMAS LAY

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OKLAHOMA**

STATE OF OKLAHOMA, ex rel., W. A. DREW)
EDMONDSON, in his capacity as ATTORNEY)
GENERAL OF THE STATE OF OKLAHOMA and)
OKLAHOMA SECRETARY OF THE)
ENVIRONMENT C. MILES TOLBERT, in his)
capacity as the TRUSTEE FOR NATURAL)
RESOURCES FOR THE STATE OF)
OKLAHOMA,)

Plaintiff,)

v.)

Case No. 4:05-CV-329-JOE-SAJ

TYSON FOODS, INC.; TYSON POULTRY, INC.;)
TYSON CHICKEN, INC.; COBB-VANTRESS,)
INC.; AVIAGEN, INC.; CAL-MAINE FOODS,)
INC.; CARGILL TURKEY PRODUCTION, LLC;)
GEORGE'S, INC.; GEORGE'S FARMS, INC.;)
PETESON FARMS, INC.; SIMMONS FOODS,)
INC; and WILLOW BROOK FOODS, INC.,)

Defendants.)

EXHIBIT "1" TO: MOTION FOR ADMISSION *PRO HAC VICE*

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OKLAHOMA

STATE OF OKLAHOMA, ex rel. EDMONDSON, et al.

vs.

Plaintiff(s)

Case No. 4:05CV329-JOE-SAJ

TYSON FOODS, INC., et al.

Defendant(s)

ATTACHMENT TO MOTION FOR ADMISSION PRO HAC VICE

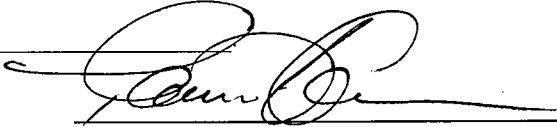
I hereby request admission to the Bar of this Court PRO HAC VICE in support of which I represent that the answers to the following questions are complete, true and correct:

1. Full name: THOMAS J. GREVER
2. State bar membership number: 53487
3. Business address, telephone and fax numbers:
LATHROP & GAGE L.C.
2345 GRAND BLVD.
KANSAS CITY, MISSOURI 64108-2612
PH: 816-292-2000 FX: 816-292-2001
4. List all state and federal courts or bar associations in which you are a member "in good standing" to practice law:
OHIO
MISSOURI
U.S. DISTRICT COURTS: N.D. Ohio, S.D. Ohio, W.D. Missouri
U.S. COURT OF APPEALS: Sixth Circuit
5. Have you been denied admission, disbarred, suspended from practice, reprimanded, denied "in good standing" status, or otherwise disciplined by any court, bar association, grievance committee or administrative body? ☐ Yes ☒ No
6. Have any proceedings which could lead to any such disciplinary action been instituted against you in any such bodies? ☐ Yes ☒ No
(Please attach a statement explaining any "YES" answers to questions 5 or 6.)
7. Are you familiar with the Federal Rules of Evidence, the Federal Rules of Civil or Criminal Procedure (as applicable to this case) and the local rules of this court? ☒ Yes ☐ No

A check should be made payable to the U.S. District Court Clerk.

(United States Government Attorneys are exempted from paying this fee.)

DATED this 28th day of September 2005


Signature of Applicant

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OKLAHOMA

STATE OF OKLAHOMA,)	
)	
Plaintiff,)	
)	
v.)	Case No. 4:05-cv-00329-JOE-SAJ
)	
TYSON FOODS, INC., et al.,)	
)	
Defendants.)	

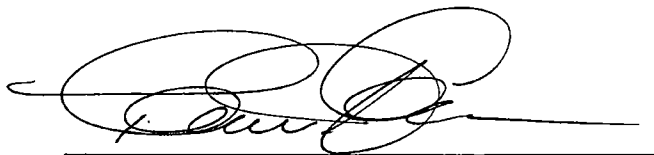
NOTICE OF ENTRY OF APPEARANCE

COMES NOW Thomas J. Grever of the law firm of Lathrop & Gage, L.C., and hereby enters his appearance in the above-referenced matter as lead counsel on behalf of the Defendant, Willow Brook Foods, Inc.

Respectfully submitted,

Dated: October 3, 2005

LATHROP & GAGE L.C.



Thomas J. Grever, *appearing pro hac vice*
(Mo #53487)
2345 Grand Boulevard
Suite 2800
Kansas City, Missouri 64108-2684
Telephone: (816) 292-2000
Telecopier: (816) 292-2001

Attorney for Defendant
Willow Brook Foods, Inc.

CERTIFICATE OF SERVICE

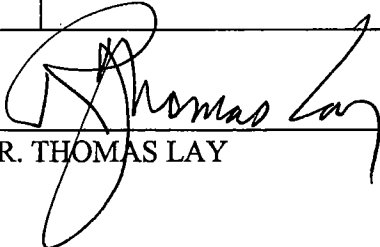
I hereby certify that on this 3rd day of October, 2005, I electronically transmitted the foregoing document to the Clerk of the Court using the ECF System for filing and transmittal of a Notice of Electronic Filing to the following ECF registrants:

C. Miles Tolbert, Esq. Secretary of the Environment 3800 N. Classen Blvd. Oklahoma City, OK 73118 mtolbert@owrb.state.ok.us	David Phillip Page, Esq. James Randall Miller, Esq. Louis Werner Bullock, Esq. Miller Keffer & Bullock 222 S. Kenosha Tulsa, OK 74120-2421 davidpage@mklawtulsa.net rmiller@mkblaw.net lbullock@mkblaw.net
Douglas Allen Wilson, Esq. Melvin David Riggs, Esq. Richard T. Garren, Esq. Sharon K. Weaver, Esq. Riggs, Abney, Neal, Turpen, Orbison & Lewis 502 W. 6 th St. Tulsa, OK 74119-1010 Doug_Wilson@riggsabney.com driggs@riggsabney.com rgarren@riggsabney.com sweaver@riggsabney.com	Elizabeth C. Ward, Esq. Frederick C. Baker, Esq. Motley Rice LLC 28 Bridgeside Blvd. Mount Pleasant, SC 29464 eward@motleyrice.com fbaker@motleyrice.com
Robert Allen Nance, Esq. Dorothy Sharon Gentry, Esq. Riggs, Abney, Neal, Turpen, Orbison & Lewis 5801 N. Broadway, Suite 101 Oklahoma City, OK 73118 rnance@riggsabney.com sgentry@riggsabney.com	W. A. "Drew" Edmondson, Esq. Office of Attorney General State of Oklahoma State Capitol Building, Room 112 2300 N. Lincoln Blvd. Oklahoma City, OK 73105 drew_edmondson@oag.state.ok.us
William H. Narwold, Esq. Motley Rice LLC 20 Church St., 17 th Floor Hartford, CT 06103 bnarwold@motleyrice.com	Stephen L. Jantzen, Esq. Ryan, Whaley & Coldiron, P.C. 900 Robinson Renaissance 119 N. Robinson Ave. Oklahoma City, OK 73102 sjantzen@ryanwhaley.com
Martin Allen Brown, Esq.	Theresa Noble Hill, Esq.

Philip D. Hixon, Esq.
Nicole Marie Longwell, Esq.
Archer Scott McDaniel, Esq.
Joyce Paul & McDaniel
1717 S. Boulder Ave., Suite 200
Tulsa, OK 74119
mbrown@jpm-law.com
phixon@jpm-law.com
nlongwell@jpm-law.com
smcdaniel@jpm-law.com

John H. Tucker, Esq.
Rhodes Hieronymus Jones Tucker & Gable
100 W. 5th St., Suite 400
P. O. Box 21100
Tulsa, OK 74121-1100
Thill@rhodesokla.com
jtuckercourts@rhodesokla.com

Patrick Michael Ryan, Esq.
Ryan, Whaley & Coldiron
119 N. Robinson, Suite 900
Oklahoma City, OK 73102
pryan@ryanwhaley.com



R. THOMAS LAY

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OKLAHOMA**

STATE OF OKLAHOMA, ex rel., W. A. DREW)
EDMONDSON, in his capacity as ATTORNEY)
GENERAL OF THE STATE OF OKLAHOMA and)
OKLAHOMA SECRETARY OF THE)
ENVIRONMENT C. MILES TOLBERT, in his)
capacity as the TRUSTEE FOR NATURAL)
RESOURCES FOR THE STATE OF)
OKLAHOMA,)

Plaintiff,)

v.)

Case No. 4:05-CV-329-JOE-SAJ

TYSON FOODS, INC.; TYSON POULTRY, INC.;)
TYSON CHICKEN, INC.; COBB-VANTRESS,)
INC.; AVIAGEN, INC.; CAL-MAINE FOODS,)
INC.; CARGILL TURKEY PRODUCTION, LLC;)
GEORGE'S, INC.; GEORGE'S FARMS, INC.;)
PETESON FARMS, INC.; SIMMONS FOODS,)
INC; and WILLOW BROOK FOODS, INC.,)

Defendants.)

EXHIBIT "2" TO: MOTION FOR ADMISSION *PRO HAC VICE*

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OKLAHOMA

State of Oklahoma,

vs.

Tyson Foods, Inc., et al.,

Plaintiff(s)

Case No. 4:05-CV-00329

Defendant(s)

ATTACHMENT TO MOTION FOR ADMISSION PRO HAC VICE

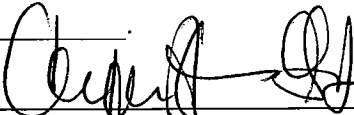
I hereby request admission to the Bar of this Court PRO HAC VICE in support of which I represent that the answers to the following questions are complete, true and correct:

1. Full name: Jennifer Stockton Griffin
2. State bar membership number: Missouri Bar No. 44406
3. Business address, telephone and fax numbers:
Lathrop & Gage, L.C.
314 East High Street
Jefferson City, MO 65101
4. List all state and federal courts or bar associations in which you are a member "in good standing" to practice law:
Missouri No. 44406
Kansas No. 17814
Illinois No. 06231318
Western District of Missouri, Eastern District of Missouri #503200, Eighth Circuit Court of Appeals
5. Have you been denied admission, disbarred, suspended from practice, reprimanded, denied "in good standing" status, or otherwise disciplined by any court, bar association, grievance committee or administrative body? ☐ Yes ☒ No
6. Have any proceedings which could lead to any such disciplinary action been instituted against you in any such bodies? ☐ Yes ☒ No
(Please attach a statement explaining any "YES" answers to questions 5 or 6.)
7. Are you familiar with the Federal Rules of Evidence, the Federal Rules of Civil or Criminal Procedure (as applicable to this case) and the local rules of this court? ☒ Yes ☐ No

A check should be made payable to the U.S. District Court Clerk.

(United States Government Attorneys are exempted from paying this fee.)

DATED this 29th day of September, 2005



Signature of Applicant

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OKLAHOMA

STATE OF OKLAHOMA,

Plaintiff,

v.

TYSON FOODS, INC., et al.,

Defendants.

Case No. 4:05-cv-00329-JOE-SAJ

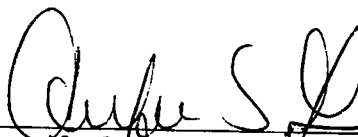
NOTICE OF ENTRY OF APPEARANCE

COMES NOW Jennifer S. Griffin of the law firm of Lathrop & Gage, L.C., and hereby enters her appearance in the above-referenced matter as co-counsel on behalf of the Defendant, Willow Brook Foods, Inc.

Respectfully submitted,

Dated: October 3, 2005

LATHROP & GAGE L.C.



Jennifer S. Griffin, *appearing pro hac vice*
(Mo #44406)

314 East High Street

Jefferson City, Missouri 64108-2684

Telephone: (573) 893-4336

Telecopier: (573) 893-5398

Attorney for Defendant
Willow Brook Foods, Inc.

CERTIFICATE OF SERVICE

I hereby certify that on this 3rd day of October, 2005, I electronically transmitted the foregoing document to the Clerk of the Court using the ECF System for filing and transmittal of a Notice of Electronic Filing to the following ECF registrants:

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Douglas Allen Wilson, Esq. Melvin David Riggs, Esq. Richard T. Garren, Esq. Sharon K. Weaver, Esq. Riggs, Abney, Neal, Turpen, Orbison & Lewis 502 W. 6 th St. Tulsa, OK 74119-1010 Doug_Wilson@riggsabney.com driggs@riggsabney.com rgarren@riggsabney.com sweaver@riggsabney.com	Elizabeth C. Ward, Esq. Frederick C. Baker, Esq. Motley Rice LLC 28 Bridgeside Blvd. Mount Pleasant, SC 29464 lward@motleyrice.com fbaker@motleyrice.com
Robert Allen Nance, Esq. Dorothy Sharon Gentry, Esq. Riggs, Abney, Neal, Turpen, Orbison & Lewis 5801 N. Broadway, Suite 101 Oklahoma City, OK 73118 rnance@riggsabney.com sgentry@riggsabney.com	W. A. "Drew" Edmondson, Esq. Office of Attorney General State of Oklahoma State Capitol Building, Room 112 2300 N. Lincoln Blvd. Oklahoma City, OK 73105 drew_edmondson@oag.state.ok.us
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Martin Allen Brown, Esq.	Theresa Noble Hill, Esq.

<p>Philip D. Hixon, Esq. Nicole Marie Longwell, Esq. Archer Scott McDaniel, Esq. Joyce Paul & McDaniel 1717 S. Boulder Ave., Suite 200 Tulsa, OK 74119 mbrown@jpm-law.com phixon@jpm-law.com nlongwell@jpm-law.com smcdaniel@jpm-law.com</p>	<p>John H. Tucker, Esq. Rhodes Hieronymus Jones Tucker & Gable 100 W. 5th St., Suite 400 P. O. Box 21100 Tulsa, OK 74121-1100 Thill@rhodesokla.com jtucker@rhodesokla.com</p>
<p>Patrick Michael Ryan, Esq. Ryan, Whaley & Coldiron 119 N. Robinson, Suite 900 Oklahoma City, OK 73102 pryan@ryanwhaley.com</p>	



R. THOMAS LAY